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9 **UNITED STATES DISTRICT COURT**
CENTRAL DISTRICT OF CALIFORNIA

10 JAMES MURTAGH, M.D., *an individual*,) CASE NO.

11) 2:15-cv-05204-BRO-FFM

12 Plaintiff,

)
13) NOTICE OF
14) MOTION TO COMPEL
15) DOCUMENT PRODUCTION

16 vs.

)
17 DAVID PARDO, *an individual*,
18) Discovery Cutoff: June 17, 2016
19) Pretrial Conference: August 15,
and) 2016
20 JOHN DOES, 1 to 10,
21) Trial Date: September 13, 2016
22 Defendants.
23)
24) Hearing Date: May 31, 2016
25) Time: 10:00AM
26) Courtroom: No. 580
27) Judge: Frederick F. Mumm
28) Hon. Beverly Reid O'Connell

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:
PLEASE TAKE NOTICE that on May 31, 2016 at 10:00 a.m., or as soon thereafter as the matter may be heard in Courtroom 580 of the Roybal Federal Building, 255 East Temple Street Courthouse, Los Angeles, California 90012-3332, Plaintiff JAMES MURTAGH, MD will move the

Court to compel the production of documents related to witness DAVID STEELE related to communications between Mr. David Steele and Mr. Clark Baker and Mr. David Pardo regarding plaintiff on the grounds that such documents are relevant and necessary to proving allegations in Plaintiff's Complaint.

The Motion will be based on this Notice of Motion, Motion to Compel, attached exhibits, and Declarations of plaintiff Dr. James Murtagh, MD and Steven Smith, counsel.

Respectfully Submitted

Dr. James Murtagh, MD

By: /s/ Steven D. Smith
Steven D. Smith
Counsel for Plaintiff James Murtagh, M.D.

DATED: APRIL 27, 2016